

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 20-37 (ES)
	:	
v.	:	<u>PROTECTIVE ORDER</u>
	:	<u>BY CONSENT</u>
EDGAR RUIZ-GOMEZ,	:	
a/k/a "Gono,"	:	
a/k/a "Carlitos 2,"	:	
a/k/a "Carlitos 3,"	:	
a/k/a "Carlitos 4,"	:	
a/k/a "Carlos 4,"	:	
a/k/a "Carlitos 5,"	:	
a/k/a "Carlos"	:	

PROTECTIVE ORDER

WHEREAS this matter having come before the Court on the application of the United States of America (Rachael A. Honig, Acting United States Attorney for the District of New Jersey, by Lauren E. Repole and Francesca Liquori, Assistant U.S. Attorneys) and consented to by defendant Edgar Ruiz-Gomez (Perry Primavera, Esq., appearing) (the "Defendant") in the above-captioned matter for an order restricting discovery and inspection pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, and good and sufficient cause having been shown,

IT IS ON THIS 7th day of September, 2021,

ORDERED that the application of the United States for an order restricting discovery and inspection of the materials pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure is granted; and it is

FURTHER ORDERED that the discovery produced by the United States shall be used only for purposes of this case and shall be returned to the United States upon further resolution of this case.

FURTHER ORDERED that, except as further described herein, neither the discovery itself nor the information reflected in the discovery materials (including the identity of witnesses and personal identifying information) shall be disseminated or shared with anyone beyond counsel for the Defendant, a member of the Defendant's law firm who is assisting with the defense of this case and has reviewed this protective order, and/or an individual who has been hired by the defense to assist the defense so long as that individual has agreed in writing to be bound by this protective order (collectively, the "Defense Team"). The Defense Team and the Defendant shall not release any discovery or information gleaned from discovery with any other person not a part of the Defense Team, including the Defendant's family or associates.

FURTHER ORDERED that while the Defendant shall have the opportunity to review all discoverable materials, no member of the Defense Team shall provide the Defendant with copies of: (a) any communication intercepted during the course of the investigation relating to this matter (the "Intercepted

Communications"); (b) any application, order, or document related to the Intercepted Communications; and it is

FURTHER ORDERED that, in the event that the parties wish to attach discovery materials to written submissions to the Court and/or identify or otherwise describe a witness or personal identifying information reflected in the discovery materials in this case, any such submission be filed under seal.

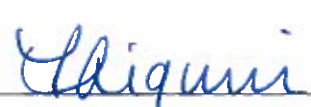


Honorable Esther Salas
United States District Judge

Accepted and Acknowledged:

Rachael A. Honig
Acting United States Attorney

By:



Lauren E. Repole
Francesca Liquori
Assistant U.S. Attorneys



Perry Primavera, Esq.
Counsel for Edgar Ruiz Gomez